



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
IDAHO OPERATIONS OFFICE  
950 West Bannock Street  
Boise, Idaho 83702

**MEMORANDUM**

**SUBJECT:** Burma Road - CGP Compliance Evaluation Inspection

**FROM:** Patrick Stoll  
Inspection and Enforcement Management Unit  
EPA/Idaho Operations Office  
950 W. Bannock St., Suite 900  
Boise, ID 83702

**DATE:** May 21, 2014

**TO:** Kimberly Ogle, Manager  
U.S. Environmental Protection Agency  
R10/OCE/IEMU, OCE-184  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Kim,

Enclosed are two copies of the Burma Road inspection report along with a 3560-3 CWA reporting form for each of the three operators involved in the project (your signature will be required on the 3560s). I also wanted to let you know that I have received additional information from Apollo, Inc. (the contractor and one of the three operators on the project) that I did not include in the report. The following is a summary of three conversations I had with Apollo employees:

1. Brett Brown (Apollo), Burma Road Project Engineer, called me the day after I conducted the 3/25/2014 Burma Road compliance evaluation inspection to let me know that Apollo had recommended rock armoring for one of the problem slopes identified on stormwater compliance inspection report #66 (see *Areas of Concern* #2 in my Burma Road inspection report). According to Mr. Brown, LHTAC Construction Manager Tod Bartolome would not authorize the work.
2. I called Tom O'Neil (the Apollo on-site Project Superintendent from the start of the project until he was transferred to another project on 3/10/2014) on 4/25/2014. Mr. O'Neil confirmed the information I had previously received from Mr. Brown – that Tod Bartolome would not authorize the money to armor a slope that Apollo was concerned about. O'Neil also told me that he (O'Neil) had recommended keeping a crew on standby in the area over a January weekend when heavy rain was forecast; the crew would be available to monitor and address any erosion issues as they occurred. Mr. Bartolome would not authorize the expenditure.

3. I called Brett Brown and spoke with him again on 5/8/2014. According to Mr. Brown, the operators were all hoping and planning for project completion by the end of the first construction season, October 2013, rather than the October 2014 date noted on the eNOIs and in the SWPPP. The operators were apparently confident that the project could be pushed along and completed in one construction season rather than the two seasons noted in the project paperwork. Mr Brown acknowledged that if they (Apollo) had realized what they were getting into, they would have done thing quite differently.

Please don't hesitate to let me know if you have any questions or need any additional information from me.

Thanks,

Pat